

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM
ZHANG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-02809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND
LLC and JOHNNY HONG, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,
DANIEL LARIMER, IAN GRIGG, and
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-03829

CLASS ACTION

**DECLARATION OF DANIEL L. BERGER IN OPPOSITION TO MOTION OF JD
ANDERSON, DAVID MUHAMMAD, RAJITH THIAGARAJAN, CHASE WILLIAMS,
AND TOKEN FUND I LLC
FOR APPOINTMENT OF LEAD PLAINTIFFS, AND
APPROVAL OF SELECTION OF CO-LEAD COUNSEL**

I, Daniel L. Berger, declare as follows:

1. I am a Director of Grant & Eisenhofer P.A. (“G&E”), 485 Lexington Avenue, New York, NY 10017, co-counsel for Crypto Assets Opportunity Fund LLC (“CAOF”).
2. I submit this declaration in opposition to the Motion of JD Anderson, David Muhammad, Rajith Thiagarajan, Chase Williams, and Token Fund I LLC for Appointment of Lead

Plaintiffs and Approval of Selection of Roche Cyrulnick Freedman LLP and Selendy & Gay PLLC as Co-Lead Counsel, and in further support of the motion of Crypto Assets Opportunity Fund LLC's motion for lead plaintiff appointment and approval of its choice of counsel (ECF No. 22).

3. Attached hereto as Exhibit 1 is a true and correct copy of The Token Fund, *Closing Down*, Medium.com (June 14, 2018), found at <https://medium.com/@TheTokenFund/closing-down-74223ecea67c>.

4. Attached hereto as Exhibit 2 is a true and correct copy of *The Token Fund Founders Set October Launch for Tokenbox Platform For Crypto Assets Fund Creation*, PRNewswire.com (Sept. 17, 2017 11:19 ET), found at <https://www.prnewswire.com/news-releases/the-token-fund-founders-set-october-launch-for-tokenbox-platform-for-crypto-assets-fund-creation-648244583.html>.

5. Attached hereto as Exhibit 3 is a true and correct copy of a Business Profile of Token Fund Ltd., published by the Accounting and Corporate Regulatory Authority of the Government of Singapore. This was accessed by searching the ACRA's website for the term "Token Fund I." ACRA's website can be found at:
https://www.tis.bizfile.gov.sg/ngbtisinternet/faces/oracle/webcenter/portalapp/pages/TransactionMain.jspx?selectedETransId=dirSearch&_afLoop=12344590769754087&_afWindowMode=0&_afWindowId=blank&_adf.ctrl-state=8skinuc9g_62.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 22, 2020.

/s/ Daniel L. Berger
Daniel L. Berger